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By Electronic Submission to the National Labor Relations Board

Re: Request for Information Concerning Representation Case Procedures

Dear Board Members:

I represent labor unions in various proceedings before the National Labor Relations Board, including Board-conducted elections. The amendments to the procedures adopted in December 2014 constitute modest and common-sense changes in the processing of petitions for an election. The amendments should not be rescinded or altered. In my experience under the amended rules:

- Unnecessary litigation has been reduced and the time required for the Board to process representation petitions has been shortened.
- The rules have been made simpler and easier for union representatives and employees to understand.
- Board practice has been brought more into line with judicial practice and thus made participation in representation cases easier for counsel.
- All parties have been accorded due process.
- Employers that wished to do so have mounted vigorous campaigns that have effectively conveyed the same types of information using the same methods as was the case prior to the amendments.
- Employees have been better able to exercise their right to petition and to make a free choice of whether to be represented.

Thank you for your attention to this matter.

Sincerely,


Adrienne L. Saldaña